

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

FEDERAL TRADE COMMISSION,)	
STATE OF CALIFORNIA,)	
STATE OF COLORADO,)	
STATE OF ILLINOIS,)	
STATE OF INDIANA,)	
STATE OF IOWA,)	
STATE OF MINNESOTA,)	
STATE OF NEBRASKA,)	
STATE OF OREGON,)	
STATE OF TEXAS,)	
and)	
STATE OF WISCONSIN,)	
)	Civil Action No. 22-CV-828
Plaintiffs,)	
)	
v.)	
)	
SYNGENTA CROP PROTECTION AG,)	
SYNGENTA CORPORATION,)	
SYNGENTA CROP PROTECTION, LLC,)	
and)	
CORTEVA, INC.,)	
)	
Defendants.)	

**MOTION TO EXTEND THE WORD LIMIT FOR THE MEMORANDUM OF
LAW IN SUPPORT OF SYNGENTA’S MOTION TO DISMISS**

Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC (collectively, “Syngenta”), by and through their undersigned attorneys and pursuant to Local Rule 7.3(d)(1) and this Court’s inherent authority, respectfully request leave to file a memorandum in support of their Motion to Dismiss that exceeds the 6,250 word limit of Local Rule 7.3(d)(1).

In support of this Motion, Syngenta states as follows:

1. On September 29, 2022, the Federal Trade Commission and ten states (collectively, “Plaintiffs”) filed a Complaint in this action. (ECF No. 1).
2. The Complaint is 91 pages long and includes 242 numbered paragraphs.
3. Plaintiffs assert 14 separate causes of action, including claims under Sections 1 and 2 of the Sherman Act, Section 3 of the Clayton Act, Section 5 of the FTC Act, and numerous state antitrust and consumer protection laws of ten states.
4. Simultaneously with the filing of this Motion, Syngenta is moving to dismiss the Complaint for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6).
5. The circumstances here render a word-limit increase appropriate. Syngenta’s Motion to Dismiss the lengthy Complaint demonstrates that there are several principal grounds for dismissal. Further, the questions presented by Plaintiffs’ claims have been subject to thorough judicial consideration under well-established precedent. While making an effort to be concise, clearly organizing and explicating that abundant law for the Court’s consideration of the Motion to Dismiss has required Syngenta to exceed the 6,250-word limit.
6. Syngenta’s Proposed Memorandum in Support of their Motion to Dismiss, attached hereto as Exhibit A, contains 7,726 words, counting those parts of the memorandum directed to be included by Local Rule 7.3(d)(1).

7. Syngenta has sought Plaintiffs' position on this requested extension of the word limit. Plaintiffs have indicated that they cannot yet state a position on the relief sought by Syngenta in this Motion.

8. A proposed Order is submitted herewith.

Date: December 12, 2022

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*Specially appearing under L.R. 83.1(d)

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